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Attorneys for Defendant
STEPHEN A. FINN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOANNA C. SULLIVAN

Plaintiff,

vs.

STEPHEN A. FINN and DOES 1 through 10,
inclusive

Defendant.

Case No. 16-cv-01948-WHO

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES
FOR RESPONSE AND REPLY TO
PLAINTIFF'S MOTION TO AMEND
PLAINTIFF'S COMPLAINT [DKT. 62]

Date: December 14, 2016
Time: 2:00 p.m.
Judge: Hon. William H. Orrick
Location Ctrm. 2, 17th Fl.

Plaintiff Joanna C. Sullivan ("Plaintiff") and Defendant Stephen A. Finn ("Defendant")
(collectively, the "Parties"), in accord with Rules 6-1 and 6-2 of the Local Rules for the United
District Court for the Northern District of California, by and through their counsel of record,
stipulate and agree as follows:

WHEREAS, Plaintiff has filed a motion to amend Plaintiff's complaint ("Motion to
Amend") [Dkt. 62];

1 WHEREAS, Defendant's Response to Plaintiff's Motion to Amend filed on November 4,
2 2016 [Dkt. 62] is currently due on November 18, 2016, and Plaintiff's Reply to Defendant's
3 Response is currently due on November 25, 2016;

4 WHEREAS, the Court has set the Motion to Amend hearing for December 14, 2016 [Dkt.
5 62];

6 WHEREAS, the Parties have met and conferred about potentially resolving the Motion to
7 Amend without the need for further briefing or a hearing;

8 WHEREAS, Defendant's counsel has been unable to confer with client regarding the
9 Motion to Amend due to Defendant's need to attend to serious health issues in Defendant's family;
10 and

11 WHEREAS, Plaintiff is willing to provide Defendant with additional time to respond to the
12 Motion to Amend so that Defendant's counsel can confer with Defendant and potentially resolve
13 the Motion to Amend without the need for further briefing or a hearing.

14 NOW THEREFORE, the Parties stipulate and agree, subject to the Court's approval, as
15 follows:

- 16 1. Defendant's Response to the Motion to Amend will be due on November 28, 2016;
17 and
18 2. Plaintiff's Reply to the Response to the Motion to Amend will due on December 5,
19 2016.

20 Respectfully submitted,

21 Dated: November 16, 2016.

22 PILLSBURY WINTHROP SHAW PITTMAN LLP
23 Philip S. Warden
24 Andrew D. Lanphere
25 Judy J. Bao

26 By: /s/ Andrew D. Lanphere
27 Attorney for Defendant Stephen A. Finn
28

BEYERS COSTIN SIMON

By: /s/ Peter L. Simon

Peter L. Simon

Attorney for Plaintiff Joanna C. Sullivan

ATTESTATION CLAUSE

I attest under penalty of perjury that the concurrence in filing of this document has been obtained from its signatories.

By: /s/ Andrew D. Lanphere

PROPOSED ORDER

Based on the stipulation of the parties and good cause appearing therefor, it is hereby
ORDERED that:

1. Defendant's Response to Plaintiff's Motion to Amend Plaintiff's Complaint
[Dkt. 62] shall be due on November 28, 2016; and
2. Plaintiff's Reply to Defendant's Response to Plaintiff's Motion to Amend Plaintiff's
Complaint shall be due on December 5, 2016.

IT IS SO ORDERED:

Dated: November 16, 2016



William H. Orrick
United States District Judge